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FEDERAL COMMUNICATIONS COMMISSION
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January 10, 1994

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William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street N. W.
Room 222
Washington, D. C 20554

RE: Ex Parte Presentation in CC Docket No. 92-77

Dear Mr. Caton:

Pursuant to Section 1.1206(a)(2) of the Commission's Rules, 47 C.F.R. sec 1.1206(a)(2), the Association for Local Telecommunications Services (ALTS) hereby files an original and two copies of this letter concerning: 1) a meeting held by myself on behalf of ALTS, James M. Smith and Genevieve Morelli of the Competitive Telecommunications Association, Robert Castellano of AT&T, Cindy Schonhaut of MFS Communications, Jean Kiddoo of the law firm of Swidler & Berlin with Rudy Baca, legal advisor to Commissioner Quello, on January 5, 1994 and 2) meetings held by myself, James Smith, Genevieve Morelli, Robert Castellano, Cindy Schonhaut and J. Manning Lee of TCG with Kathleen Levitz, Acting Chief, Common Carrier Bureau, Mark Nadel, Common Carrier Bureau, Karen Brinkmann, legal advisor to Chairman Hundt, Linda Oliver, legal advisor to Commission Duggan and James Coltharp, special assistant to Commissioner Barrett, on January 6, 1994. The purpose of these meetings was to discuss the issues outlined on the attachment to this letter

Please direct any inquiries into the above matter to the undersigned.

Sincerely,

Heather Burnett Gold
President

cc: Rudy Baca
James Coltharp
Kathleen Levitz
ITS

Karen Brinkmann
Linda Oliver
Mark Nadel

attachment

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BILLED PARTY PREFERENCE: AN IDEA WHOSE TIME HAS PASSED

AN EX PARTE PRESENTATION IN CC DOCKET NO. 92-77 BY:

*ASSOCIATION FOR LOCAL TELECOMMUNICATIONS SERVICES
AT&T
COMPETITIVE TELECOMMUNICATIONS ASSOCIATION
MFS COMMUNICATIONS
TCG*

BILLED PARTY PREFERENCE: AN IDEA WHOSE TIME HAS PASSED

The Public Interest Concerns Which Led to the Proposal Have Been Resolved by Intervening Events

- TOCSIA implementation -- all "public phones" now unblocked and subject to carrier branding
- Interexchange carriers have been (and will continue) actively marketing and educating their customers to use "dial around" products -- FCC Report to Congress (December 1992) found that access code dialing had achieved wide acceptance
- Even today, over 60% of transient end users reach their desired interexchange carrier without any additional processing (i.e. IXC's customer uses a payphone presubscribed to her/his carrier)
- Many other operator-assisted calls (i.e. "0-" calls, coin-sent paid, collect) are routed to carrier of choice through live operator intervention

The Cost to Implement the System Is Excessive - Particularly When Unnecessary For Vast Majority of Calls

- Estimated implementation cost - \$1.5 billion -- Would result in an additional charge of \$0.63 per call benefitted by BPP

The Implementation of BPP Would Undermine Commission Public Policy Objectives in Other Matters

- Would impede development of competition for local access services -- Interexchange carriers and aggregators would not be able to use any alternatives to existing local exchange carrier for operator-assisted services or traffic
- Would undermine most efficient use of network -- Large users would be precluded from using special access for operator-assisted traffic or services
- Would contravene FCC policies which favor unfettered CPE interconnection and payphone competition